

Re: DNRC's Final EIS and Habitat Conservation Plan (HCP) for endangered and threatened species on Montana School Trust Lands

Attn: Mike O'Herron

The following comments are submitted as an individual and in behalf of Montana Conservation Voters (MCV).

Experts from United States EPA, Montana FWP, and Montana DEQ have reviewed the DNRC's Final EIS and found it lacking in substantial protections sufficient to safeguard grizzly bear, Canada lynx, bull trout and other imperiled species pursuant to terms of the federal Endangered Species Act. At issue is habitat for five imperiled species whose habitat will be adversely affected by timber harvests on Montana School Trust lands.

Whereas only insignificant changes were offered by DNRC as it moved from draft to final EIS for habitat on school lands, I am joining with the noted agencies, state and federal, seeking the modifications noted below. MCV, as well, advocates changing the EIS in the same manner:

1. Shorten the plan's 50-year timeframe to accommodate vagaries observed due to climate change. Make this a **ten-year plan** which can be extended or modified after monitoring .

2. Include a conservation alternative that would **improve habitat conditions** for the threatened and endangered species. The alternatives considered so far just increase road mileage, road density, logging and grazing; all of these are detrimental to the imperiled species.

3. DNRC has omitted State Trust Lands critical as habitat for the imperiled species. Include **all** state school trust lands essential for the protection of these species.

Thank you for your consideration.

Bob Adams,

As a citizen and as a member of Montana Conservation Voters (MCV)

406.443.3248, Helena 59601 (Adams)

P.O. Box 63, Billings 559103, 406.254.1593 (MCV)